



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

J. Gordon Stephens, Jr., Treasurer
Burson-Marsteller Political
Action Committee
1850 M Street, NW, Ste. 900
Washington, DC 20036

MAR 8 1995

Identification Number: C00201863

Reference: Amended Mid-Year Report (1/1/93-6/30/93) dated
12/15/94

Dear Mr. Stephens:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-The beginning cash balance of this report should equal the ending balance of your 1992 Year End Report. Please clarify this discrepancy and amend any subsequent report(s) that may be affected by this correction.

-Schedule A supporting Line 11(a)(1) of your report discloses contributions received through what appears to be a payroll deduction plan. Please amend your report to disclose the frequency of deduction. 11 CFR §104.8(b) Please refer to the enclosed sample of properly reported payroll deductions.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

Neil Evans
Reports Analyst
Reports Analysis Division

PAYROLL DEDUCTIONS

| SCHEDULE A ITEMIZED RECEIPTS | | Use separate schedules for each category of the Donor Itemization Page | | PAGE | OF |
|--|--|---|-------------------------------|---------------------------------------|----|
| Contributions from Individuals | | | | FOR LINE NUMBER 11 (b)(3) | |
| <i>Any information copied from such Receipts and Statements may not be used or relied by any person for the purpose of reporting contributions or for campaign purposes, other than using the names and addresses of any political contributors to make contributions from such individuals.</i> | | | | | |
| NAME OF COMMITTEE OR PAC | | National Organization PAC 000000001 | | | |
| A. Full Name, Mailing Address and ZIP Code | | Name of Employee | Date received Year-to-Date | Amount of Cash Received per Person | |
| Anne Sullivan 121 10th Street City, State ZIP | | National Organization, Inc. | payroll deduction | \$72.00 | |
| Name Per _____ One month | | Employee Branch Manager Amount Year-to-Date > \$ | 128.00 | (81.2 Year-to-Date) | |
| B. Full Name, Mailing Address and ZIP Code | | Name of Employee | Date received Year-to-Date | Amount of Cash Received per Person | |
| Rodney Jones 881 Hamptons Road City, State ZIP | | National Organization, Inc. | payroll deduction | \$180.00 | |
| Name Per _____ One month | | Chairman Amount Year-to-Date > \$ | 380.00 | (120 Year-to-Date) | |

Itemize payroll deductions only after they have exceeded \$200 per calendar year from an individual.

Payroll Deductions

Once an individual's deductions aggregate over \$200 in a calendar year, report the total amount deducted from the donor's paychecks during the reporting period on Schedule A. In parentheses indicate the amount that was deducted each pay period. Instead of stating a specific date of receipt, write "payroll deduction" under "Date." The other itemized information, including the year-to-date total, must be completed for each donor. 104.8(b).

EXAMPLE: During an election year, a corporate manager authorizes her employer to deduct \$12 per pay period (each pay period is two weeks) for the company's SSF. The SSF, which files FEC reports on a quarterly schedule, includes the manager's contributions as "unitemized contributions" in its April and July quarterly reports. By June 30, the closing date for the July report, the manager's aggregate contributions are \$196 — still below the \$200 itemization threshold. By September 30 — the closing date for the October quarterly report — the manager's contributions reach \$228. Therefore, the committee itemizes the total contributions received from the manager during the third quarter (\$120), providing the year-to-date total in the appropriate space. (See item A in the illustration above.)

IN-KIND CONTRIBUTIONS

| SCHEDULE A ITEMIZED RECEIPTS | | Use separate schedules for each category of the Donor Itemization Page | | PAGE | OF |
|--|--|---|-------------------------------|--|----|
| Contributions from Individuals | | | | FOR LINE NUMBER 11 (b)(3) | |
| <i>Any information copied from such Receipts and Statements may not be used or relied by any person for the purpose of reporting contributions or for campaign purposes, other than using the names and addresses of any political contributors to make contributions from such individuals.</i> | | | | | |
| NAME OF COMMITTEE OR PAC | | National Organization PAC 000000001 | | | |
| A. Full Name, Mailing Address and ZIP Code | | Name of Employee | Date received Year-to-Date | Amount of Cash Received per Person | |
| Martin L. Krebs 4 River Road City, State ZIP | | National Organization, Inc. | 8/19/92 | \$2,000.00 (100-ELEND) CRAFFLE PRIZE) | |
| Name Per _____ One month | | Chairman Amount Year-to-Date > \$ | 5,000.00 | | |

In-Kind Contributions

When determining whether to itemize an *in-kind* contribution, follow the same guidelines listed above under "When to Itemize Receipts." See Chapter 2 for information on how to determine the dollar value of an *in-kind* contribution.

In addition, add the value of the *in-kind* contribution to the operating expenditures total on Line 21(b) (in order to avoid inflating the cash-on-hand amount). 104.13(a)(2).

If the *in-kind* contribution must be itemized on Schedule A, then it must also be itemized on a Schedule B for operating expenditures. See the illustration at right.

Appreciated Goods

When a committee receives an *in-kind* contribution whose value may

| SCHEDULE B ITEMIZED EXPENDITURES | | Use separate schedules for each category of the Donor Itemization Page | | PAGE | OF |
|--|--|---|-------------------------------|--|----|
| Operating Expenditures/Other Federal | | | | FOR LINE NUMBER 21(b) | |
| <i>Any information copied from such Receipts and Statements may not be used or relied by any person for the purpose of reporting contributions or for campaign purposes, other than using the names and addresses of any political contributors to make contributions from such individuals.</i> | | | | | |
| NAME OF COMMITTEE OR PAC | | National Organization PAC 000000001 | | | |
| A. Full Name, Mailing Address and ZIP Code | | Property or Equipment | Date received Year-to-Date | Amount of Cash Received per Person | |
| Martin L. Krebs 4 River Road City, State ZIP | | radio price | 8/19/92 | \$8,000.00 (100-ELEND) (CRAFFLE PRIZE) | |
| Name Per _____ One month | | Amount Year-to-Date > \$ | 8,000.00 | (100-ELEND) (CRAFFLE PRIZE) | |

Itemize *in-kind* contributions on both Schedules A and B so as not to inflate the cash-on-hand amount.

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